

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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KATHLEEN GIARDINA AND LYNN PANARIELLO

Plaintiff,

CV-08-2007

-against-

NOTICE OF MOTION

NASSAU COUNTY, NASSAU COUNTY AND THE
CIVIL SERVICE EMPLOYEES ASSOCIATION, INC.,
A.F.S.C.M.E., LOCAL 1000, AFL-CIO, BY ITS
LOCAL 830,

Defendants.
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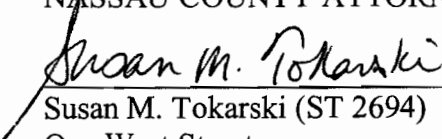
NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, and
all the pleadings heretofore had herein, the defendants, County of Nassau, by their
attorney LORNA B. GOODMAN, Nassau County Attorney, Susan M. Tokarski, Deputy
County Attorney, move pursuant to Rule 12 of the Federal Rules of Civil Procedure to
dismiss the plaintiffs complaint for failure to state a cause of action as the claims are
barred by res judicata and collateral estoppel.

Dated: Mineola, New York
August 31, 2009

By:

LORNA B. GOODMAN
NASSAU COUNTY ATTORNEY


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